

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff

v.

No: 19-cv-01930

\$53,082,824.19 IN U.S. CURRENCY,

Defendant

**BANCO SAN JUAN INTERNACIONAL'S MOTION TO RESTRICT**

Abbe David Lowell, *Pro hac vice* pending  
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*Counsel for Banco San Juan Internacional, Inc.*<sup>1</sup>

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<sup>1</sup> Co-counsel for BSJI in this proceeding, DLA Piper and Sonia Torres, are not counsel in sealed proceeding No. 19-Misc.-163, and are thus not in possession of the materials referenced in the restricted submission that necessitate this Motion to Restrict. Nor are they identified as counsel on the restricted submission. They are, however, identified as co-counsel with respect to all non-restricted submissions. As co-counsel in this matter, DLA and Ms. Torres might otherwise have access to the restricted material, but both confirm, as officers of the Court, that they will not review restricted material filed in this action concerning the sealed proceeding until authorized by the Court.

Consistent with Standing Order No. 9 (January 30, 2013), Banco San Juan Internacional, Inc. (BSJI) respectfully moves to file its Motion for a Suppression Hearing (Dkt. 23) as a restricted filing with the “selected parties” designation. The Motion references material from a sealed, but related, miscellaneous action (No. 19-Misc.-163), and that seal has not yet been removed. Thus, BSJI must file its Motion as restricted to ensure that sealed material is not made publicly available. Only the undersigned counsel and the government should have access to the restricted filings because they were involved in the related action.<sup>2</sup> BSJI will separately file a redacted version of its Motion so that the public may have access to all information to which it is entitled.

Dated: October 16, 2019

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### **CERTIFICATE OF SERVICE**

I certify that the foregoing was filed on October 16, 2019 with the Clerk of Court using the CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

/s/ Guillermo-Ramos Luiña  
Guillermo Ramos Luiña

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<sup>2</sup> Currently, these are the only parties in the matter, but BSJI requests a selected parties designation to ensure the material is protected if other claims are filed. BSJI is unaware of any other claims.